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Department of Energy

ROCKY FLATS FIELD OFFICE
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GOLDEN, COLORADO 80402-0928

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JAN 29 1999

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VOORHEIS, G M		
Nesta, A	X	X

Ms Carol M Borgstrom, Director
U S Department of Energy, EH-42
Office of NEPA Policy and Assistance
1000 Independence Avenue, S W , FORS, Room 3E-080
Washington, D C 20585

Dear Carol

This memo delivers to your office the Rocky Flats Field Office's "Annual NEPA Planning Summary," in accordance with DOE Order 451 1A

Please contact me at (303) 966-7198 with any questions

John C. Morris
John Morris
NEPA Compliance Officer

Enclosure

COR. CONTROL	X	X
ADMIN RECORD	X	X
PATS/T130G		

cc w/Enc
K Koch, OCC, RFFO
S Nesta, K-H
Public Reading Rooms
Administrative Record

Reviewed for Addressee
Corres Control RFP

2/1/99 *SK*
Date By

Ref Ltr #

DOE ORDER # 451.1A

ADMIN RECORD
SW-SW-A-03042

ROCKY FLATS FIELD OFFICE

ANNUAL NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) PLANNING SUMMARY

January 1999

DOE Order 451 1A (National Environmental Policy Act Compliance Program) requires the Rocky Flats Field Office to submit an "Annual NEPA Planning Summary" to the Assistant Secretary for Environment, Safety and Health. This document is submitted in compliance with that requirement.

The Planning Summary consists of three sections:

- Status of Ongoing NEPA Compliance Activities,
- Upcoming Environmental Assessments, summarizing the subject matter, cost, and schedule of any environmental assessments expected to start during the next 12 months, and
- Upcoming Environmental Impact Statements, summarizing the subject matter, cost, and schedule of any environmental impact statements expected to start during the next 24 months.

Cost and schedule information for completion of each NEPA review identified is provided within the discussion of each review.

The Order also requires that every three years a field organization include in its NEPA planning summary an evaluation of whether a site-wide environmental impact statement (SWEIS) would facilitate future NEPA compliance efforts. Additionally, DOE NEPA regulations [10 CFR Part 1021.330(d), issued April 24, 1992] include a requirement that a Supplement Analysis (SA) (as discussed at 10 CFR Part 1021.314(c)) be conducted at least every five years to determine whether an existing site-wide EIS is adequate or whether a new or supplemental EIS should be prepared. In 1996, RFETS addressed the need for a SWEIS. In accordance with these requirements, an updated evaluation is being conducted in 1999; the background and process for this evaluation are described under "Status of Ongoing NEPA Compliance Activities."

The Rocky Flats Cleanup Agreement (RFCA) specifies that closure activities at the Site "will be conducted as CERCLA removal actions." This is consistent with the Secretarial policy (1997) and eliminates the need to prepare separate environmental assessment(s) on CERCLA actions, through incorporation of NEPA values in the decision or planning documents for the related activities. Review of such documents is conducted for appropriate inclusion of NEPA values. Environmental impacts of activities that cannot undergo functionally equivalent NEPA review through CERCLA, such as activities under

the Resource Conservation and Recovery Act (RCRA) permit, are subject to a separate NEPA review process

Status of NEPA Compliance Activities

A draft Site Wide Environmental Impact Statement (SWEIS) was prepared in 1996 to analyze the environmental impacts associated with the Site's mission change from production to environmental management operations. The 1980 SWEIS examined environmental impacts of operation in the Industrial Area, with the Buffer Zone serving as what was and will continue to be a security buffer so long as nuclear material is located on Site. This draft SWEIS was canceled in early 1997 because data generated during the development of the draft SWEIS in relation to cleanup plans indicates that environmental impacts of cleanup activities will be localized in the Industrial Area and will not present appreciable changes in Site-wide environmental impacts from those associated with Site operations reviewed under the 1980 SWEIS.

Much of the data generated in development of the draft SWEIS is contained in the Rocky Flats Cumulative Impacts Document (CID) which was made available to the public in RFETS reading rooms in June 1997. Although not formally identified as such, publication of the CID did satisfy several of the requirements attendant to a SA. Specifically, the CID analysis did examine environmental impacts associated with changes in the proposed action at RFETS and any significant new circumstances and information relevant to environmental concerns. DOE also made this analysis available to the public, as required for SAs. Public notification of the results of DOE's determination of whether a new site-wide EIS is required was effected through the announcement that the 1996 draft SWEIS was being deferred.

Future, ongoing NEPA compliance activities with respect to evaluating the need for a site-wide EIS will include conduct of an analysis of the Cases addressed in the CID to cross-reference activities in the current RFETS Closure Plan to those considered in the CID. This analysis will bring the SA up to date through FY 1998 and will be conducted as part of the annual NEPA Baseline Evaluation, beginning with the FY 1998 Baseline. It will document whether the environmental impacts of current and planned future activities at the Site are adequately addressed in the CID.

During FY 1998, NEPA reviews were conducted under the functional equivalency approach for the following CERCLA decision documents:

- IHSS 118.1 IM/IRA Technical Memorandum
- Decision Document for Solar Ponds Plume Remediation
- Decision Document for East Trenches Plume Remediation
- Building 776/777 Closure Project Decommissioning Operations Plan

Ongoing Environmental Assessments

Currently, there are three environmental assessments in preparation

- Draft Environmental Assessment for the Shipment of Low Level and Low Level Mixed Waste DOE proposes to ship low level mixed (LLMW) and low level (LLW) waste to offsite disposal locations, to remove wastes generated as part of previous operations and during environmental restoration activities from RFETS (in accordance with RFCA) The proposed shipments are estimated to exceed the annual mileage defined as a bounding condition for Rocky Flats shipments analyzed in the 1980 Site Wide EIS The proposal calls for shipment of LLMW to the Envirocare disposal facility in Clive, Utah and to DOE's Hanford Site in Richland, WA, and for the shipment of LLW to DOE's Nevada Test Site The Draft EA is scheduled for release for public review in December 1998 and the Final EA is scheduled for February 1999 Total cost is estimated at \$62,000
- Draft Environmental Assessment for the On-Site Treatment of Low Level Mixed Waste DOE proposes to treat certain LLMW (3,000 to 6,500 m³) on-site, prior to off-site shipment for disposal, using one of ten known treatment processes for LLMW The Draft EA is scheduled for release for public review in December 1998 and the Final EA is scheduled for February 1999 Total cost is estimated at \$37,000
- Draft Environmental Assessment on Vegetation Management in the Buffer Zone A Site working group, in consultation with the State of Colorado and the U S Fish & Wildlife Service, is in the process of defining a site-wide program for weed control and vegetation management in the Rocky Flats Buffer Zone An EA is being prepared to address impacts of this program and to satisfy public interest in this program element The schedule for this EA calls for a draft to be issued for public comment in February 1999, with a Final EA issued in April 1999 This EA is being prepared by DOE-RFFO

In addition, it should be noted that the Final Environmental Assessment and Finding of No Significant Impact for the McKay Bypass Canal Extension was issued in September 1998 Total cost for this EA was \$21,500

Upcoming Environmental Assessments

One possible environmental assessment for the Site is identified below This environmental assessment is recognized as being needed but currently there is a lack of funding to begin the planning process

- Construction of a new building to provide expanded storage for TRU/TRUM wastes pending opening of WIPP may require an environmental assessment This building would be constructed in the Industrial Area and would have a total storage area of about 200,000 square feet Impacts to be evaluated would include worker and public

health and safety Estimated contractor cost is \$60,000, based on recent experience with similar EAs at the Site

Ongoing Environmental Impact Statements

The Final Environmental Impact Statement on Management of Certain Plutonium Residues and Scrub Alloy Stored at the Rocky Flats Environmental Technology Site was issued August 1998, and the Record of Decision issued December 1, 1998

Upcoming Environmental Impact Statements

The Site has identified one upcoming and one possible environmental impact statement

- **Provision of off-Site Waste Disposal** The project would involve the disposal of LLW and LLMW at the Laidlaw/Safety Kleen facility (Deer Trail) in Colorado The level of NEPA review for this proposal was identified in last year's summary report as an environmental assessment However, because of the potential controversy and policy issues associated with the project, the review has been elevated to an environmental impact statement The Notice of Intent is currently scheduled to be published 1999, with the Final Environmental Impact Statement and ROD anticipated in late 1999 Depending on the final scope of the EIS, the estimated total cost is \$ 1.5 million (based on recent DOE system-wide experience)
- **Future Use/Land Transfer** The environmental impact statement would address final Site disposition Preparation of the EIS could begin as early as 1999 and take up to three years, although the timing and choice of specific analyses are still under discussion While it is anticipated that an environmental impact statement will be the required level of NEPA review for the future use decisions, the level of review for the land transfer could change to an environmental assessment The level of review will depend upon the degree of potential for future use(s), the potential impacts and the entity or entities to which the parcel(s) would be transferred Estimated total cost is \$ 1.5 million (based on recent DOE system-wide experience)